

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: Brian A Lauritsen and Bobbie M  
Lauritsen  
Debtors

JPMorgan Chase Bank, National Association,  
Movant,  
v.

Brian A Lauritsen and Bobbie M Lauritsen,  
Debtors,  
and  
Ronda J. Winnecour, Trustee,  
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER  
21-70307-JAD

Hearing Date and Time: 9/24/2021 at 09:00  
AM

Docket #: \_\_\_\_\_

Related to Doc # 2

**OBJECTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION TO  
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

JPMorgan Chase Bank, National Association, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about July 30, 2021, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by a mortgage lien on real estate which is not the principal residence of Debtor located at 840 24th Street, Altoona, PA 16601.
3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$4,938.36, and a total claim in the amount of \$19,634.18.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$1,330.07 to be paid to the Trustee through the Plan.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.
7. The Plan fails to comply with 11 U.S.C. § 1325.
8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, JPMorgan Chase Bank, National Association respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ Kristen D. Little

Dated: August 26, 2021

BY: \_\_\_\_\_

Kristen D. Little  
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LLG File #:20-065665

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2021, upon consideration of the Objection of JPMorgan Chase Bank, National Association to the confirmation of Debtor's Chapter 13 Plan of Reorganization, it is hereby ORDERED that the Objection is sustained, and confirmation of Debtor's Plan is denied.

BY THE COURT:

\_\_\_\_\_  
JEFFERY A. DELLER  
UNITED STATES BANKRUPTCY JUDGE

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**CERTIFICATE OF SERVICE**

I, Kristen D. Little, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of JPMorgan Chase Bank, National Association's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on August 26, 2021:

Lawrence W. Willis, Esquire  
Willis & Associates  
201 Penn Center Boulevard Suite 310  
Pittsburgh, PA 15235  
Sent via electronic notification [ecf@westernpabankruptcy.com](mailto:ecf@westernpabankruptcy.com)

Ronda J. Winnecour, Trustee  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
Sent via electronic notification [cmecf@chapter13trusteedpa.com](mailto:cmecf@chapter13trusteedpa.com)

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

/s/ Kristen D. Little

Kristen D. Little  
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(610) 278-6800

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